

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

DEFENDANTS' UNOPPOSED MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Eastern District of Texas Local Rule 5(a)(7)(C), Defendants Samsung Electronic Co., Ltd. and Samsung Electronics America, Inc. ("Defendants") move to file their Amended Answer under seal.

There is good cause for this document to be filed under seal. Defendants' Amended Answer, along with Exhibits A and C thereto, contain information designated by Headwater Research LLC ("Plaintiff") as Attorney's Eyes Only, confidential pursuant to the protective order in this matter. Plaintiff has informed Defendants that it does not oppose Defendants' Motion to File Documents Under Seal.

Accordingly, to preserve the confidentiality of that information, Defendants respectfully request that the Amended Answer be filed under seal.

Dated: December 1, 2023

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have met and conferred in compliance with Local Rule CV-7(h). Plaintiff opposes this motion.

/s/ Thad C. Kodish
Thad C. Kodish

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on December 1, 2023. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Thad C. Kodish